

1 MICHAEL C. KANE, ESQ.  
Nevada Bar No. 10096  
2 BRADLEY J. MYERS, ESQ.  
Nevada Bar No. 8857  
3 JOEL S. HENGSTLER, ESQ.  
Nevada Bar No. 11597  
4 **THE702FIRM INJURY ATTORNEYS**  
8335 West Flamingo Road  
Las Vegas, Nevada 89147  
5 Telephone: (702) 776-3333  
Facsimile: (702) 505-9787  
6 **E-Mail:** [service@the702firm.com](mailto:service@the702firm.com)

7 GEOFFREY C. PARKER, ESQ.  
(Pro Hac Vice)  
8 **HILTON PARKER LLC**  
7658 Slate Ridge Boulevard  
9 Reynoldsburg, Ohio 43068  
Telephone: (614) 992-2277  
10 Facsimile: (614) 927-5980  
11 **E-Mail:** [gparker@hiltonparker.com](mailto:gparker@hiltonparker.com)

12 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

13 CHLOE C., pseudonymously,

14 Plaintiff,

15 vs.

16 JAMAL F. RASHID, et al.,

17 Defendants.

Case No. : 2:23-cv-2056-GMN-BNW

**STIPULATION AND ORDER TO  
MODIFY BRIEFING SCHEDULE  
RELATING TO DEFENDANTS'  
PENDING MOTIONS TO DISMISS  
PLAINTIFF'S FIRST AMENDED  
COMPLAINT**

**(SECOND REQUEST)**

18  
19  
20  
21 Plaintiff Chloe C. ("Plaintiff") and Defendants Wynn Las Vegas, LLC; The Light Group,  
22 LLC; Highgate Hotels, L.P.; STK Las Vegas, LLC; The One Group, LLC; The One Group  
23 Hospitality, Inc.; MGM Resorts International; Aria Resort & Casino LLC; Nevada Property 1,  
24 LLC; and Desert Palace, LLC (collectively the "stipulating Defendants"), by and through their  
25 respective counsel of record, hereby agree, stipulate, and respectfully request that the Court  
26 extend the deadline for Plaintiff to respond to the stipulating Defendants' pending motions to  
27 dismiss by seven (7) additional days. This is the second request to extend the response deadline  
28 and resulting reply deadline. Because the response deadline has already been extended once by

seven (7) days (*see* ECF No. 65), this results in a total extension of fourteen (14) days with a due date for Plaintiff's response(s) of March 29, 2024.

Additionally, Plaintiff and the stipulating Defendants hereby agree, stipulate, and respectfully request that the Court similarly extend the deadline for the stipulating Defendants to reply in support of their pending motions to dismiss by fourteen (14) days, resulting in a due date of April 19, 2024 for such replies.

**Summary of Stipulated (Proposed) Briefing Schedule:**

Motions to Dismiss Previously Filed	March 1, 2024
Plaintiff's Response(s) Due	March 29, 2024
Defendants' Replies Due	April 19, 2024

The undersigned represent that this stipulation is not designed for purposes of delay.

Dated: March 14, 2024

/s/ Geoffrey Parker

Geoffrey Parker, Esq. (*Pro Hac Vice*)  
HILTON PARKER LLC  
7658 Slate Ridge Blvd.  
Reynoldsburg, OH 43068  
Tel: (614) 992-2277  
Fax: (614) 927-5980  
gparker@hiltonparker.com  
*Attorney for Plaintiff*

/s/ Nicole M. Perry (per auth.)

Nicole M. Perry, Esq. (*Pro Hac Vice*)  
JONES DAY  
717 Texas Street, Suite 3300  
Houston, TX 77002  
Telephone: (832) 239-3939  
Facsimile: (832) 239-3600  
Email: nmperry@jonesday.com  
*Attorney for Defendant Wynn Las Vegas, LLC*

/s/ Jeremy R. Alberts (per auth.)

Jeremy R. Alberts, Esq.  
Nevada Bar No. 10497  
jalberts@wwhgd.com  
Christopher T. Byrd, Esq.  
Nevada Bar No. 6582  
cbyrd@wwhgd.com  
WEINBERG, WHEELER, HUDGINS, GUNN &  
DIAL, LLC  
6385 South Rainbow Blvd., Suite 400  
Las Vegas, Nevada 89118  
Telephone: (702) 938-3838  
Facsimile: (702) 938-3864  
*Attorneys for Defendant The Light Group, LLC*

/s/ Josh Cole Aicklen (per auth.)

JOSH COLE AICKLEN  
Nevada Bar No. 007254  
Josh.Aicklen@lewisbrisbois.com  
HUONG X. LAM  
Nevada Bar No. 010916  
Huong.Lam@lewisbrisbois.com  
LEWIS BRISBOIS BISGAARD & SMITH  
LLP  
6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118  
Telephone: 702.893.3383  
Facsimile: 702.893.3789  
*Attorneys for Defendant HIGHGATE  
HOTELS LP*

/s/ Jennifer L. Braster (per auth.)

Jennifer L. Braster  
Nevada Bar No. 9982  
Meredith L. Markwell  
Nevada Bar No. 9203  
NAYLOR & BRASTER  
10100 W. Charleston Blvd., Suite 120  
Las Vegas, NV 89135  
Telephone: (702) 420-7000  
jbraster@nblawnv.com  
*Attorneys for Defendant STK Las Vegas,  
LLC, The One Group Hospitality, Inc., and  
The One Group, LLC*

/s/ Emily A. Buchwald (per auth.)

Todd L. Bice, Esq., Bar No. 4534  
TLB@pisanellibice.com  
Emily A. Buchwald, Esq., Bar No. 13442  
EAB@pisanellibice.com  
Alexandra N. Mateo, Esq., Bar No. 16275  
PISANELLI BICE PLLC  
400 South 7th Street, Suite 300  
Las Vegas, Nevada 89101  
Telephone: 702.214.2100

DLA PIPER LLP (US)  
Angela C. Agrusa (*pro hac vice  
forthcoming*)  
2000 Avenue of the Stars, Suite 400  
Los Angeles, California 90067-4704  
Ellen E. Dew (*pro hac vice forthcoming*)  
650 S. Exeter Street, Suite 1100  
Baltimore, Maryland 21202-4576  
*Attorneys for Defendant Aria Resort &  
Casino Holdings LLC, MGM Resorts  
International, and Nevada Property 1, LLC*

/s/ Kristen T. Gallagher (per auth.)

Kristen T. Gallagher (NSBN 9561)  
McDONALD CARANO LLP  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, Nevada 89102  
Telephone: (702) 873-4100  
kgallagher@mcdonaldcarano.com

Ann H. MacDonald (*pro hac vice*)  
ARENTFOX SCHIFF LLP  
233 South Wacker Drive, Suite 7100  
Chicago, IL 60606

Elise H. Yu (*pro hac vice*)  
ARENTFOX SCHIFF LLP  
350 South Main Street, Suite 210  
Ann Arbor, MI 48104 *Attorneys for*  
*Defendant Desert Palace LLC*

PER STIPULATION OF THE PARTIES,  
the briefing schedule is hereby set as  
follows: Plaintiff's Responses to  
Defendants' Motions to Dismiss will be due  
on March 29, 2024; and Defendants' Replies  
will be due on April 19, 2024.

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT COURT  
JUDGE

Dated: March 14, 2024

**28**

**THE702FIRM**